

Exhibit 11

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:) Chapter 15 Case
)
FAIRFIELD SENTRY LIMITED, et al.,) Case No. 10-13164
) (CGM)
Debtors in Foreign Proceedings.) Jointly Administered
)
FAIRFIELD SENTRY LIMITED (IN LIQUIDATION), et al.,)
)
Plaintiffs,) Adv. Pro. No. 10-03496
) (CGM)
– against –) Administratively
) Consolidated
THEODOOR GGC AMSTERDAM, et al.,)
)
Defendants.)
)
FAIRFIELD SENTRY LIMITED (IN LIQUIDATION), et al.,)
)
Plaintiffs,)
)
v.) Adv. Pro. No. 10-03630
) (CGM)
HSBC SECURITIES SERVICES (LUXEMBOURG) SA, et al.,)
)
Defendants.)

**FACT STIPULATION REGARDING MOTION TO DISMISS FOR INSUFFICIENT
SERVICE OF PROCESS**

Consolidated Plaintiffs¹ and Private-Space Ltd. (“PSL”) (together, “the parties”), by and through undersigned counsel, state as follows:

WHEREAS, at a conference held on April 21, 2021, the Court ruled that any Defendant wishing to move to dismiss under Rule 12(b)(5) of the Federal Rules of Civil Procedure must preserve the right to make the motion on the record at the same conference and must move by May 21, 2021;

WHEREAS, at the April 21, 2021 conference, the Court permitted discovery on service issues, as stated in the transcript and in the subsequent Order dated April 26, 2021, as to any entity that moved to dismiss under Rule 12(b)(5);

WHEREAS, on May 21, 2021, PSL moved to dismiss the complaints as to PSL in adversary proceeding 10-03630 under Rules 4 and 12(b)(5) of the Federal Rules of Civil Procedure, and Rules 7004(a) and 7012 of the Federal Rules of Bankruptcy Procedure (Dkt. 3747, 3762, 3763);

WHEREAS, on May 27, 2021, Consolidated Plaintiffs served Requests for Production and a Notice of Rule 30(b)(6) Deposition on PSL;

WHEREAS, on June 28, 2021, PSL served Responses and Objections to Consolidated Plaintiffs' Requests for Production and Notice of Rule 30(b)(6) Deposition;

¹ “Consolidated Plaintiffs” are Kenneth Krys and Greig Mitchell (or their predecessors) as Liquidators and Foreign Representatives of all three funds—Fairfield Sentry Limited (In Liquidation), Fairfield Sigma Limited (In Liquidation), and Fairfield Lambda Limited (In Liquidation).

WHEREAS, the parties have met and conferred on various discovery disputes and have agreed to enter into a stipulation in satisfaction of discovery disputes concerning Consolidated Plaintiffs' May 27, 2021 Requests for Production and Notice of Rule 30(b)(6) Deposition;

IT IS HEREBY STIPULATED AND AGREED THAT:

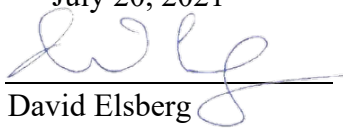
1. In November 2010, PSL retained the law firm of Gilmartin, Poster & Shafto LLP ("Gilmartin"), located at 845 Third Avenue, New York, NY 10022, to provide advice, and to the extent necessary or appropriate take action to protect its interests, with respect to the actions filed by Consolidated Plaintiffs in the United States to recover redemption payments.

2. Since November 2010 and continuing until the present, Gilmartin has been (a) monitoring the proceedings in the redeemer actions, including adversary proceeding 10-03630, (b) advising PSL of developments in the proceedings and their possible impact on PSL, and (c) offering advice as to PSL's litigation options and strategy.

3. Gilmartin did not file a formal Notice of Appearance on behalf of PSL in adversary proceeding 10-03630 until January 2017, following which PSL joined Defendants' initial consolidated motion to dismiss, and Gilmartin filed supplemental and individual motion papers on behalf of PSL in support of that motion.

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Dated: New York, New York
July 20, 2021

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